

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA )  
v. ) No. 23-cr-17-LM  
ANDREW MAHN, )  
Defendant. )

## **ORGANIZATIONAL VICTIM STATEMENT**

**Fed. R. Crim. P. 12.4(b) and LCrR 12.4.1(b)**

A Superseding Information and Plea Agreement were filed with the Clerk's office on November 8, 2023.

The United States of America, by Jane E. Young, the United States Attorney for the District of New Hampshire, and Alexander S. Chen, an Assistant U.S. Attorney, has identified an organizational victim as part of the new charging document. Pursuant to Fed. R. Crim. P. 12.4(b) and Local Rule 12.4.1(b), the Government discloses the following information about this victim.

1. Motorola: This is a publicly-traded corporation with headquarters in Chicago, Illinois. The Government is unaware of any parent corporation or upcoming merger agreements. No individual shareholder owns more than 10% of Motorola stock. However, publicly-available information indicates The Vanguard Group, an investment firm that invests on behalf of many clients, owns 12% of Motorola stock.

Respectfully submitted,

JANE E. YOUNG  
United States Attorney

Dated: November 9, 2023

By: /s/ Alexander S. Chen  
Alexander S. Chen  
Assistant U.S. Attorney  
53 Pleasant Street, 4<sup>th</sup> Floor  
Concord, New Hampshire 03301  
(603) 225-1552  
Alexander.chen@usdoj.gov